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Defendant SHAKEY'S PIZZA ASIA
VENTURES, INC. and Third Party Defendants
CINCO CORPORATION, PC
INTERNATIONAL PTE LTD., and SPAVI
INTERNATIONAL USA, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAKEY'S PIZZA ASIA VENTURES,
INC, A PHILIPPINES
CORPORATION,

Plaintiff,

v.

PCJV USA, LLC, A DELAWARE
LIMITED LIABILITY COMPANY;
PCI TRADING, LLC, A DELAWARE
LIMITED LIABILITY COMPANY;
GUY KOREN, AN INDIVIDUAL;
POTATO CORNER LA GROUP, LLC,
A CALIFORNIA LIMITED
LIABILITY COMPANY; NKM
CAPITAL GROUP, LLC, A
CALIFORNIA LIMITED LIABILITY
COMPANY; J & K AMERICANA,
LLC, A CALIFORNIA LIMITED
LIABILITY COMPANY; J&K
LAKEWOOD, LLC, A CALIFORNIA
LIMITED LIABILITY COMPANY;
J&K VALLEY FAIR, LLC, A
CALIFORNIA LIMITED LIABILITY
COMPANY; J & K ONTARIO, LLC, A

Case No. 2:24-CV-04546-SB(AGRx)

The Hon. Stanley Blumenfeld, Jr.

**PLAINTIFF SHAKEY'S PIZZA
ASIA VENTURES, INC.'S
REQUEST FOR LEAVE TO
APPEAR REMOTELY AT THE
SEPTEMBER 16, 2025 HEARING;
DECLARATION OF MICHAEL
MURPHY**

Complaint Filed: May 31, 2024

Trial Date: August 18, 2025

CALIFORNIA LIMITED LIABILITY COMPANY; HLK MILPITAS, LLC, A CALIFORNIA, LIMITED LIABILITY COMPANY; GK CERRITOS, LLC, A CALIFORNIA, LIMITED LIABILITY COMPANY; J&K PC TRUCKS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; AND, GK CAPITAL GROUP, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY AND DOES 1 THROUGH 100, INCLUSIVE,

Defendants.

PCJV USA, LLC, A DELAWARE LIMITED LIABILITY COMPANY; PCI TRADING LLC, A DELAWARE LIMITED LIABILITY COMPANY; POTATO CORNER LA GROUP LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; GK CAPITAL GROUP, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; NKM CAPITAL GROUP LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; AND GUY KOREN, AN INDIVIDUAL,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES, INC, A PHILIPPINES CORPORATION,

Counter Defendant.

PCJV USA, LLC, A DELAWARE LIMITED LIABILITY COMPANY; PCI TRADING LLC, A DELAWARE LIMITED LIABILITY COMPANY; POTATO CORNER LA GROUP LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; GK CAPITAL GROUP, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; NKM CAPITAL GROUP LLC, A CALIFORNIA LIMITED LIABILITY COMPANY; AND GUY KOREN, AN INDIVIDUAL,

1 Third Party Plaintiffs,

2 v.

3 PC INTERNATIONAL PTE LTD., A
4 SINGAPORE BUSINESS ENTITY;
5 SPAVI INTERNATIONAL USA, INC.,
6 A CALIFORNIA CORPORATION;
7 CINCO CORPORATION, A
8 PHILIPPINES CORPORATION; AND
9 DOES 1 THROUGH 10, INCLUSIVE,

10 *Third Party Defendants.*

11 As per this Court's Rules and Procedures, Plaintiff Shakey's Pizza Asia
12 Ventures, Inc. respectfully requests that lead counsel Michael D. Murphy be given
13 leave to appear at the September 16, 2025 hearing in this Court by remote appearance,
14 using the zoom instructions contained on the webpage for this Courtroom, and in
15 compliance with the other instructions including those with respect to the regarding
16 the reliability of the connection. The good cause for this request is set forth in the
17 below Declaration of Michael Murphy. Plaintiff will ensure that a colleague, Matt
18 Follett, will attend, in person.

19 Respectfully submitted,

20 Dated: 9/15/2025

FOX ROTHSCHILD LLP

21 /s/ Michael D. Murphy

22 Michael D. Murphy

23 Matthew Follett

24 Meeghan H. Tirtasaputra

25 Attorneys for Plaintiff and Counterclaim

26 Defendant SHAKEY'S PIZZA ASIA

27 VENTURES, INC. and Third Party

28 Defendants CINCO CORPORATION,

PC INTERNATIONAL PTE LTD., and

SPAVI INTERNATIONAL USA, INC.

DECLARATION OF MICHAEL MURPHY

I, Michael D. Murphy, declare as follows:

1. I am a Partner with the law firm Fox Rothschild LLP, attorneys of record for Plaintiff and Counterclaim Defendant SHAKEY'S PIZZA ASIA VENTURES, INC. and Third-Party Defendants CINCO CORPORATION, PC INTERNATIONAL PTE LTD., and SPAVI INTERNATIONAL USA, INC. ("Plaintiff and Third Party Defendants"). I am licensed to practice before all courts in the State of California.

2. I offer this Declaration in Support of my request for leave to appear at Tuesday's hearing – September 16, 2025 – remotely, rather than in person.

3. The good cause is as follows.

4. In February of this year, I was asked, and conditionally agreed to attend my spouse's 50th high school reunion in Milwaukee, Wisconsin. I say conditionally because I was always aware that a trial in this case might make that impossible. Five days ago, when this Court issued its Order continuing trial until September 22, 2025, and setting a hearing on September 16, 2025, I advised my spouse that I could indeed attend.

5. As such, I am currently in Milwaukee, Wisconsin, and preparing to drive to Chicago today on September 15, 2025 (Monday), where I will fly out through O'Hare (direct flights out of Milwaukee are limited).

6. Concurrently with this trip, I have also been asked by a client in Denver to attend to urgent issues that have arisen in matters unrelated to this, and that I have been postponing necessary visits to address, as a result of the pending trial in this case. The request is that I fly to Denver, rather than Los Angeles today, and deal with these issues on September 16 through the 18th, returning on September 19, 2025.

7. If I were to agree to the request of this separate client, I could only do

1 so if this Court granted leave for me to attend the September 16, 2025 hearing in this
2 matter by remote appearance. If this Court declines my request, I will have to further
3 postpone the in person needs of a different client while addressing the important
4 issues to be discussed at our hearing. As this Court knows, I have not yet requested a
5 remote appearance, and would not do so unless I thought it was both important, and
6 that my participation in the September 16, 2025 hearing would be effective and
7 contribute to the tasks at hand in this case as we prepare for trial.

8 8. In that regard, I intend to, and will adhere to, this Court's other orders
9 with respect to Zoom Webinar Hearings, including the use of a reliable connection,
10 as set forth in this Court's "Procedures and Schedules" webpage.

11 9. Finally, my colleague Matt Follett will be appearance in person should
12 leave be granted as requested herein

13 I declare under penalty of perjury under the laws of the United States that the
14 foregoing is true and correct.
15

16
17 Dated: September 15, 2025

/s/ Michael D. Murphy
Michael D. Murphy

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CERTIFICATE OF SERVICE

The undersigned certifies that, on September 15, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court’s ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 15, 2025

FOX ROTHSCHILD LLP

/s/ Michael Murphy
Michael D. Murphy
Matthew Follett
Meeghan H. Tirtasaputra
Attorneys for Plaintiff and Counterclaim
Defendant SHAKEY’S PIZZA ASIA
VENTURES, INC. and Third Party
Defendants CINCO CORPORATION,
PC INTERNATIONAL PTE LTD., and
SPAVI INTERNATIONAL USA, INC.